

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GINA CRISCIONE AND ESTATE OF)	CASE NO.: 1:24-CV-01446
DOROTHY MANDANICI)	
)	JUDGE: PAMELA A. BARKER
Plaintiffs.)	
)	MAGISTRATE: JUDGE JAMES E.
v.)	GRIMES JR.
)	
LAURA DIVINCENZO, et al.,)	<u>DEFENDANTS, CITY OF BROOK PARK,</u>
)	<u>GEORGE SAKELLAKIS, HAROLD</u>
Defendants.)	<u>DUNCAN, RYAN WALSH AND THOMAS</u>
)	<u>SENSEL'S, MOTION FOR EXTENSION</u>
)	<u>OF TIME</u>
)	

Defendants, City of Brook Park, George Sakellakis, Harold Duncan, Ryan Walsh and Thomas SENSEL, (hereinafter "Defendants"), respectfully move for a 14-day extension of time (until January 9, 2025) to move or plead. Although this case has been pending since August 23, 2024, Defendants were only recently served. This case has a prior history including one prior filing in the Cuyahoga County Court of Common Pleas that involved these Defendants. Claims asserted against these Defendants were previously dismissed by the Common Pleas Court. Additionally, the Complaint includes 183 separate paragraphs and 18 causes of action. Due to the complexity of this case and other obligations related to the holidays and year-end, the undersigned counsel respectfully requests that the Court grant a 14-day extension of time (until January 9, 2025) for these Defendants to move or plead. This Motion is not opposed by Plaintiffs' counsel (who agreed, by e-mail on December 17, 2024), to consent to an extension of time until January 9, 2025 as to all Defendants.

Respectfully Submitted,

/s/ Michael L. Morgan

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CERTIFICATE OF SERVICE

A true and accurate copy of the foregoing *Motion for Extension of Time* was served this
18th day of December, 2024 via the Court's electronic filing system upon the following:

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/s/ Michael L. Morgan

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